<u>REMARKS/ARGUMENTS</u>

The amended listing of claims and the following arguments are presented generally to impart precision to the claims, by particularly pointing out and distinctly claiming the subject matter. The pending claims are supported by the specification. No new matter is added.

Applicant respectfully submits that the currently pending claims are patentable over the cited references.

<u>Priority, Drawings and Specification</u>

In response to the request of the Office Action, the specification is amended to provide application, name, number and filing date for related applications at the beginning of the disclosure.

The drawings and the specification were objected to for errors in reference signs. The specification is amended to use the reference signs shown in the drawings and mention all reference signs. Thus, the amendment overcomes the objects to the drawings and the specification.

<u>35 U.S.C. §102(e) Rejections</u>

Examiner rejected claims 1-4, 6-9, 11-14, 16-20, 22-25 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,591,272 (hereinafter "Williams"). Applicant respectfully submits that pending claims are patentable over the cited references, since the cited references do not show each and every aspect of the pending claims.

For example, claim 1 recites:

1.   (currently amended) A method comprising:
        finding <u>a set of records</u> of a database <u>matching an instance of a</u>
                <u>component of an object type</u>;

updating the set of records of the database <u>based on a first set of</u>
<u>instances of components of the object type</u>, the instances of
components of the first set corresponding to the records of the
set of records; and

inserting new records in the database <u>corresponding to a second set of</u>
<u>instances of components of the object type</u>, the instances of
components of the second set not matching records of the set of
records.

Applicant respectfully submits that the rejection in the Office Action may have been based
on reading only part of the claim limitations.

For example, for the claim section of "finding a set of records of a database matching
an instance of a component of an object type" of claim 1, the Office Action asserted that
Williams discloses "finding a set of records of a database matching an instance of a
component of an object". Note that "an object type" is completely different from "an
object". Even if the assertion were correct, the assumed disclosure of Williams does not
anticipate this claim section.

The Office Action relied upon Col. 2, lines 59-62 and Col. 4, lines 60-61 of Williams
to support the assertion that Williams discloses "finding a set of records of a database
matching an instance of a component of an object". However, Col. 2, lines 59-62 of
Williams is about the interrogation of database schema; and Col. 4, lines 60-61 of Williams
is about a user selecting objects represented by the databases in a graphical interface.

"The process of interrogation of relational database schema or catalogs to
obtain information pertaining to the database tables and the interrelationships
between database tables is well known." (Col. 2, lines 59-62 of Williams)

"An inexperienced user can, if so desired, easily select a subset of all possible objects represented by the databases through use of a simple and intuitive graphical interface." (Col. 4, lines 60-61 of Williams)

"The process of interrogation of relational database schema or catalogs" of Williams (Col. 2, lines 59-6) does not correspond to finding records of a database; and an inexperienced user *selecting* objects in a graphical interface (see, Col. 4, lines 60-61 of Williams) does not correspond to "*finding* a set of records of a database <u>matching an instance of a component of an object type</u>". In Col. 2, lines 59-62 and Col. 4, lines 60-61 of Williams, nothing corresponds to "<u>a set of records</u> of a database *matching an instance of a component of an object type*" of claim 1.

Further, for example, for the claim section of "updating the set of records of the database based on a first set of instances of components of the object type, the instances of components of the first set corresponding to the records of the set of records" of claim 1, the Office Action asserted that Williams discloses "updating the set of records" in the Office Action. Even if the assertion were correct, this assumed disclosure of Williams does not anticipate the claim section, since this claim section recites a particular way of "updating the set of records".

The Office Action relied upon Col. 3, lines 58-59 of Williams to support the assertion that Williams discloses "updating the set of records". Col. 3, lines 58-59, of Williams shows:

"In the prior art, one could typically update the underlying relational database(s) exclusively through the object system, ..." (Col. 3, lines 58-59 of Williams)

However, it is apparent that updating "the underling relational database(s)" as described in this portion of William is not updating the interrogated "relational database schema". Further, this description does not specifically show:

> "updating *the* set of records of the database *based on* <u>a first set of instances</u> of components <u>of the object type</u>, the instances of components of the first set corresponding to the records of the set of records" (see, e.g., claim 1)

The general description of "update the underlying relational database(s) exclusively through the object system" does not anticipate a specific operation as recited in claim 1.

Further, for example, for the claim section of "inserting new records in the database corresponding to a second set of instances of components of the object type, the instances of components of the second set not matching records of the set of records" of claim 1, the Office Action asserted that Williams discloses "inserting new records related to an existing object". Even if the assertion were correct, this assumed disclosure of Williams does not anticipate this claim section. The generic "inserting new records related to an existing object" of the assertion does not anticipate a specific process of "inserting new records in the database *corresponding to a second set of instances* of components <u>of the object type</u>, the instances of components of the second set <u>not matching records of the set of records</u>" of claim 1.

The Office Action relied upon Col. 14, lines 2-4 of Williams to support the assertion that Williams discloses "inserting new records related to an existing object". Col. 14, lines 2-4, of Williams shows:

> "For object insertions, an OSFORBStream is built in the client that contains the new attributes of the object to be inserted." (Col. 14, lines 2-4, of Williams)

However, it is apparent that this description is about "object insertions", not about inserting "new records in the database <u>corresponding to a second set of instances</u> of components *of the object type*, the instances of components *of the second set* <u>not matching</u> records of the set of records" (see, e.g., claim 1).

Claim 28 further recites:

28. (new) The method of claim 1, further comprising:
repeating the finding, updating and inserting with respect to instances
of child components of the components.

The Office Action relied upon Col. 73, lines 44-51, Williams for the claim section "repeating the finding, updating and inserting with respect to instances of child components of the components". However, the disclosure of Col. 73, lines 44-51, Williams is clearly not about repeating "*the* finding, updating and inserting" that are specified in claim 1. The disclosure of Col. 73, lines 44-51, Williams is not about repeating "*the* find, updating" described in Williams and relied upon for the rejection of the corresponding claim sections of claim 1.

The Office Action rejected claim 6, since claim 6 was asserted to be directed to a method for the method of claim 1. Applicant respectfully disagrees.

Claim 6 recites:

6. (currently amended) A method comprising:
finding a set of records of a database matching an instance of an object
type;
updating instances of components of the instance based on the set of
records, the instances of components corresponding to records
of the set of records, the instances of components previously
present in the object instance; and

inserting new instances of components in the object instance
corresponding to the set of records, the new instances of
components corresponding to records of the set of records.

Note that claim 1 recites "finding a set of records of a database *matching an instance of a component of* an object type", while claim 6 recites "finding a set of records of a database matching an instance of an object type".

Further, claim 1 recites "updating the set of records ... based on a first set of instances of *components* of the object type", while claim 6 recites "updating instances of components ... based on the set of *records*".

Further, claim 1 recites "inserting new records ... corresponding to a second set of instances of *components* of the object type", while claim 6 recites "inserting new instances of components ... corresponding to the set of *records*".

Therefore, claim 1 and claim 6 are clearly different. It is improper to reject claim 6 based on the incorrect assertion that claim 6 is directed to a method for the method of claim 1.

Independent claims 11, 16, 17 and 22 recite similar limitations as those discussed above. Thus, independent claims 1, 6, 11, 16, 17 and 22 are patentable over Patterson at least for the above reasons.

35 U.S.C. §103(a) Rejections

Examiner rejected claims 5, 10, 15, 21 and 26 under 35 U.S.C. §103(a) as being unpatentable over Williams in view of U.S. Patent No. 6,708,164 (hereinafter "Cseri"). Applicant respectfully submits that pending claims are patentable over the cited references, since the cited references do not show each and every aspect of the pending claims.

Cseri was relied upon for the additional limitations recited in claims 5, 10, 15, 21 and 26. The combination of Williams and Cseri do not show each and every aspect of the

independent claims 1, 6, 11, 17 and 22, as discussed above. Thus, the combination of Williams and Cseri do not show each and every aspect of the dependent claims of claims 1, 6, 11, 17 and 22. Claims 5, 10, 15, 21 and 26 depend from claims 1, 6, 11, 17 and 22. Thus, at least for the above reasons, claims 5, 10, 15, 21 and 26 are patentable over Williams in view of Cseri.

The remaining claims depend from at least one of the independent claims discussed above, and therefore include at least some of the distinguishing claim limitations as discussed above. As a result, the remaining claims are also patentable.
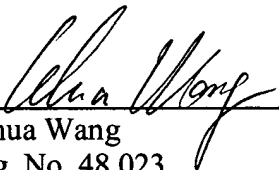
CONCLUSION

Applicant respectfully submits that the pending claims are patentable over the cited references. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date: ___1/4___, 2004

Lehua Wang
Reg. No. 48,023

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025-1026
(408) 720-8300

05306.P030   -- 21 --